

### **R E M A R K S**

Reconsideration of this application, as amended, is respectfully requested.

### **THE CLAIMS**

Independent claims 1 and 4 have been amended to clarify the recitation of moving the image data from which the link has been canceled. As clarified in amended independent claims 1 and 4, the image data from which the link is canceled is moved from the first storage area to the second storage area when the link is canceled, such that the image data from which the link is canceled is no longer stored in the first storage area, as supported by the disclosure in the specification at, for example, page 43, lines 1-4.

No new matter has been added, and it is respectfully requested that the amendments to the claims be approved and entered.

It is respectfully submitted, moreover, that the amendments to the claims are not related to patentability, and do not narrow the scope of the claims either literally or under the doctrine of equivalents.

### THE DRAWINGS

The Examiner has objected to the drawings as failing to show necessary textual labels.

It is respectfully submitted, however, that this objection is unreasonable and that it is not required to provide a text legend for every structural feature shown in the drawings and that it is not necessary to add text legends for the elements in the drawings that have not already been labeled.

Indeed, it is respectfully pointed out that 37 CFR 1.84(o) referred to by the Examiner states that legends may be required where necessary for understanding of the drawings, and that 37 CFR 1.84(o) emphasizes that the legends should contain as few words as possible.

It is respectfully submitted that the boxes and lines shown in the drawings of the present application whose structure cannot be easily understood are already labeled with text legends, and that the drawings of the present application otherwise accord with standard U.S. patent practice by using reference numerals which are described in the specification to identify the structural features shown in the drawings.

It is respectfully pointed out, moreover, that if every structural feature shown in the drawings of the present application were labeled with a descriptive legend, a large amount of text would be unnecessarily added to each drawing. For

example, the Examiner's requirement would necessitate the addition of at least 19 text legends to FIG. 2, the content of which may be readily understood by reading the specification. It is respectfully submitted that this result would clearly not be in keeping with the statement in 37 CFR 1.84(o) that drawings should contain as few words as possible.

In view of the foregoing, it is respectfully requested that the Examiner's objection to the drawings be withdrawn.

#### THE PRIOR ART REJECTION

Claims 1 and 4 were rejected under 35 USC 102 as being anticipated by USP 5,262,877 ("Otsuka"), and claims 2 and 3 were rejected under 35 USC 103 as being obvious in view of the combination of Otsuka and US 2003/0167287 ("Forster") or US 2003/0018777 ("Miller et al"). These rejections, however, are respectfully traversed.

As recognized by the Examiner, Otsuka discloses a system in which a recording medium (optical disk) 10 is provided with a variety of data storage areas as shown in Fig. 1. According to Otsuka, identification field 16 of the optical disk 10 stores "sample images" (or empty frames) B1, B2 and B3. Series of voice information e and f are also recorded as samples in the identification field 16 to be reproduced in correspondence with the sample images B1, B2 and B3 based on the control table 34

stored in the identification field 16. (Column 3, line 50 to column 4 line 19). According to Otsuka, moreover, a user may store different ("new") images In1, In2, In3 in the utility field 18 (see image storage areas 24 and 26). The new images In1, In2 and In3 are associated with the sample images B1, B2 and B3 by a conversion table 32 shown in Fig. 2 of Otsuka. With this structure, the new images In1, In2 and In3 can be reproduced in place of the sample images with the voice data e and f as shown in the table 34a in Fig. 2. According to Otsuka, moreover, voice data can be stored in the utility area of the disk 10 (storage area 28) and reproduced in a manner similar to the voice data e and f. (See, for example, column 8, line 37 to column 9, line 68).

The Examiner contends that identification field 16 of Otsuka, which stores sample images B1, B2 and B3 and voice information e and f, corresponds to the first storage area to store audio data and image data that is linked to a predetermined playback position of the audio data according to the claimed present invention. The Examiner also asserts that the image memory or video memory of the reader unit 302 of Otsuka corresponds to the second storage area to store only image data and no audio data of the claimed present invention.

The Examiner further asserts that the reproduction of the new images In1, In2 and In3 in place of sample images B1, B2

and B3 according to Otsuka, as described above, "implies the [sic] canceling a link between audio data with the sample images and creating a link between audio data and the desired images." It is respectfully pointed out, however, that this assertion by the Examiner is contradicted by the disclosure of Otsuka.

That is, it is respectfully submitted that Otsuka does not disclose canceling a link as according to the present invention as recited in independent claims 1 and 4, and it is respectfully submitted that Otsuka does not disclose moving image data as according to the present invention as recited in independent claims 1 and 4.

In particular, it is respectfully pointed out that according to Otsuka, the link between sample images B1, B2 and B3 and voice data e and f is not canceled. Instead, the link is used to reproduce new images In1, In2 and In3 at the appropriate instances with respect to voice data e and f. More specifically, according to Otsuka a control table 34 represents the link between images B1, B2 and B3 and voice data e and f. The control table 34 stores the reproduction timings of the images with respect to the voice data. This control table 34 is stored in the identification field 16 (column 4, lines 18-19), and it is respectfully submitted that Otsuka does not disclose, teach or suggest deleting the control table 34. Indeed, according to Otsuka, new images In1, In2 and In3 are stored in the utility

field 18, and another control table 32 is created to show the relationship between new images In1, In2 and In3 and sample images B1, B2 and B3. In addition, according to Otsuka, the control tables 32 and 34 are used to create a control table 34a indicating the relationship between images In1, In2 and In3 and voice data e and f. See Fig. 2 of Otsuka.

That is, as explained at, for example, column 9 of Otsuka, when reproducing new images specified by a user (images In1, In2 and In3) in place of sample images provided by a supplier of the disk, the control table 34 (showing the links between the sample images B1, B2 and B3 and the voice data) is still used to specify the relationship between the images and the voice data. Instead of retrieving and playing back sample images, however, the new images In1, In2, In3 are retrieved in accordance with the relationship set forth in conversion table 32. Thus, Otsuka does not disclose, teach or suggest canceling the link between images B1, B2 and B3 and the voice data in the first storage area (identification area 16). Instead, Otsuka uses the existing link data to appropriately playback new images in place of the sample images.

The Examiner further asserts that reading out the images from the identification area 16 by the reader (i.e., copying from the disk to a memory of the reader) of Otsuka corresponds to moving image data from which a link has been canceled as recited

in independent claims 1 and 4. It is respectfully pointed out, however, that this operation of Otsuka merely corresponds to reading data from a disk. And it is respectfully submitted that Otsuka clearly does not disclose, teach or suggest deleting the sample images B1, B2 and B3 from the identification field 16 when the sample images are read by the reader.

Accordingly, it is respectfully submitted that Otsuka clearly does not disclose, teach or suggest moving the image data, from which the link is canceled, from the first storage area to the second storage area when the link is canceled, such that the image data from which the link is canceled is no longer stored in the first storage area, as according to the present invention as recited in amended independent claims 1 and 4. That is, it is respectfully submitted that Otsuka does not disclose, teach or suggest moving image data from which a link has been canceled, in the manner of the claimed present invention.

Forster et al, moreover, has merely been cited for the disclosure of an inhibiting means for inhibiting the movement of the image data if the same image data is already stored, and Miller et al has merely been cited for the disclosure of linking information via an image header. And it is respectfully submitted that neither of these references disclose, teach or suggest the above described features of the present invention as recited in amended independent claims 1 and 4 whereby image data,

from which a link is canceled, is moved from the first storage area to the second storage area when the link is canceled, such that the image data from which the link is canceled is no longer stored in the first storage area.

In view of the foregoing, it is respectfully submitted that amended independent claims 1 and 4, and claims 2 and 3 depending from claim 1, all clearly patentably distinguish over Otsuka and Miller et al, taken singly or in combination under 35 USC 102 as well as under 35 USC 103.

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Entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned for prompt action.

Respectfully submitted,

/Douglas Holtz/

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